

**REED SMITH LLP**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	(Jointly Administered)
Debtors.	:	
	:	Refers to Dkt. Nos. 19627,
-----X	:	21254, and 22859

**WITHDRAWAL OF OBJECTION OF WOCKHARDT USA (SWISS) HOLDING AG,  
NOW KNOWN AS WOCKHARDT EU OPERATIONS (SWISS) AG, AND  
WOCKHARDT LIMITED TO DEBTORS' PROPOSED ASSUMPTION AND  
ASSIGNMENT OF DERIVATIVES AGREEMENT**

WOCKHARDT USA (SWISS) HOLDING AG, now known as WOCKHARDT EU OPERATIONS (SWISS) AG, and WOCKHARDT LIMITED ("Wockhardt") hereby gives notice of the withdrawal of its objection to the Debtors' proposed assumption of agreement between Lehman Brothers Special Financing, Inc. ("LBSF") and Wockhardt (Dkt. Nos. 19627 and 21254) and limited objection to the Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors ("Withdrawal"). In support of its Withdrawal, Wockhardt represents as follows:

PLEASE TAKE NOTICE that Lehman Brothers Special Financing Inc. ("LBSF") sought the assumption of the agreement between LBSF and Wockhardt concerning certain derivatives contracts (the "Derivative Agreement") pursuant to (i) the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (collectively, the

“Debtors”), dated December 5, 2011 (Dkt. No. 22973), (ii) the Plan Supplement, dated October 25, 2011 (Dkt. No. 21254), as thereafter amended, and (iii) that certain Notice of Proposed Assumption of Executory Contracts and Unexpired Leases Pursuant to Debtors’ Third Amended Joint Chapter 11 Plan Pursuant to Section 1121 of the Bankruptcy Code, dated October 27, 2011.

PLEASE TAKE FURTHER NOTICE that Wockhardt filed its Objection to the proposed assumption (Dkt. No. 22859, the “Objection”) of the Derivative Agreement on December 2, 2011.

PLEASE TAKE FURTHER NOTICE that by the Fourth Notice of Withdrawal or Deferral of Debtors’ Application to Assume Certain Executory Contracts, dated April 3, 2012 (Dkt. No. 27262) the Debtors withdrew the application to assume the Derivative Agreement between LBSF and Wockhardt.

PLEASE TAKE FURTHER NOTICE that Wockhardt hereby withdraws its Objection as moot.

Dated: New York, New York  
April 18, 2012

Respectfully submitted,

REED SMITH LLP

By: /s/ Andrea Pincus

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